

### **REMARKS**

Applicant thanks the Examiner for the careful review of this application. Claims 1, 15, 27 and 35 were amended to clarify the claimed embodiments. No new matter was added. Claims 13-14, 28 and 36-37 were canceled without prejudice. Therefore, claims 1-12, 16-27, 29-35 and 38-46 remain pending in this application.

### **ALLOWABLE SUBJECT MATTER**

Applicant thanks the Examiner for noting the presence of allowable subject matter in this application, namely claims 14 and 28. Claims 14 and 28 were previously dependent claims, depending directly or indirectly on independent claims 1 and 27, and were re-written into independent form via the previous Office Action response. In this current Office Action response, Applicant has folded the difference of subject matter between, claims 1 and 14, into claim 1 and canceled claim 14 without prejudice. Similarly, the difference of subject matter between, claims 27 and 28, was folded into claim 27 and claim 28 was canceled without prejudice. In other words, claim 1 is now equivalent to allowed claim 14 and claim 27 is now equivalent to allowed claim 28. As a result, Applicant respectfully submits that every claim depending directly or in-directly from independent claims 1 and 27 are now also allowable. Specifically, claims 1-12, 15 and 29-34 are now in condition for allowance.

Regarding claim 13, claim 13 was additionally canceled as the subject matter of claim 13 is now present in amended claim 1.

Regarding independent claims 26 and 35, Applicant has amended these claims such that they now also contain allowable claim restrictions similar to those in independent claims 1 and 27. Specifically, claim 16 now contains the weighting function limitation as it applies to two different frequency bands. For claim 35, claim 35 now contains computing the estimated location limitations similar to those contained in claim 27. As a result, Applicant respectfully submits that independent claims 26, 35 and

claims depending from 26 and 35, directly or indirectly, are all now in condition for allowance.

**STATEMENT OF RELATED APPLICATIONS**  
**AND INFORMATION DISCLOSURE STATEMENT**

The following patent applications have been filed and now have a common assignee with the subject application:

1) U.S. Patent Application No. 10/794,842, filed on March 5, 2004, entitled "Wireless Node Location Mechanism Responsive To Observed Propagation Characteristics Of Wireless Network Infrastructure Signals;"

2) U.S. Patent Application No. 10/788,645, filed on February 27, 2004, entitled "Selective Termination of Wireless Connections to Refresh Signal Information in Wireless Node Location Infrastructure;"

3) U.S. Patent Application No. 10/783,186, filed on February 20, 2004, entitled "Wireless Node Location Mechanism Using Antenna Pattern Diversity to Enhance Accuracy of Location Estimates;"

4) U.S. Patent Application No. 10/848,276, filed on May 24, 2004, entitled "Wireless Node Location Mechanism Featuring Definition of Search Region to Optimize Location Computation;"

5) U.S. Patent Application No. 10/982,153, filed on November 5, 2004, entitled "Raster-to-Vector Conversion Operations Adapted to Modeling of RF Propagation;" and

6) U.S. Patent Application No. 10/938,460, filed on September 10, 2004, entitled "Enhanced Wireless Node Location using Differential Signal Strength Metric."

In addition, there has been at least one Office Action in the above-mentioned U.S. Patent Application No. 10/848,276 in which some of the claims were rejected. For the Examiner's convenience, a copy of that Office Action is included in the accompanying Information Disclosure Statement.

**REJECTIONS UNDER 35 U.S.C. § 102(b)**

Claims 1-2, 4, 6-12, 16, 19, 21-27, 29-36, 38 and 40-46 were rejected under 35 U.S.C. § 102(b) as being anticipated by Bahl (U.S. Patent No. 6,799,047). Applicant respectfully traverses for the following reasons.

Bahl apparently discloses a method for locating a user in a wireless network is disclosed. A mobile computer which seeks to determine its location within a building by detecting the signal strength of one or more wireless base stations placed at known locations throughout the building. An environmentally profiled table of known locations within the building and the base station signal strength at those locations is searched to find the stored signal strength most similar to the signal strength detected. The location corresponding to the most similar stored signal strength is determined to be the current location of the mobile computer. The table can be derived empirically, by placing a mobile computer at the known locations and measuring the signal strength of the wireless base stations at those locations, or it can be derived mathematically by taking into account a reference signal strength, the distance between the reference point and the known location, and the number of intervening walls between the reference point and the known location. As an alternative, the base stations can measure the signal strength of the mobile computer. In such a case, the table would relate a known position of the mobile computer to the signal strength of the mobile computer as measured by the one or more base stations. Environmental profiling is achieved by comparing several different tables, corresponding to several different environments, and using the table that minimizes the error. Environmental profiling can be applied to tables determined empirically or mathematically.

Since allowable subject matter was placed into independent claims 1 and 27, Applicant respectfully submits that Bahl does not disclose claims 1-2, 4, 6-12, 27 and 29-34. Applicant also respectfully submits that claims 19, 21-26, 35, 38 and 40-46 are also allowable as claims 29, 21-26, 36, 38 and 40-46 depend, directly or indirectly from independent claims 16 and 35. As previously indicated, Applicant has placed allowable subject matter into claims 16 and 35. Claim 36 was canceled without prejudice and the rejection of that claim is now moot. Withdrawal of the rejections of the claims is respectfully requested.

**REJECTIONS UNDER 35 U.S.C. § 103(a)**

Claim 13 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bahl. Claims 3, 18 and 37 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bahl in view of Stilp (U.S. Patent No. 5,327,144). Claims 5, 15, 20 and 39 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bahl in view of Kovach (U.S. Patent No. 6,317,604). Applicant respectfully traverses for the following reasons.

Bahl was previously summarized. Stilp apparently discloses a cellular telephone location system for automatically recording the location of one or more mobile cellular telephones comprises three or more cell site systems. Each cell site system is located at a cell site of a cellular telephone system. Each cell site system includes an antenna that may be mounted on the same tower or building as the antenna employed by the cellular telephone system and equipment that may be housed in the equipment enclosure of the corresponding cell site. The cell site systems are coupled via T1 communication links to a central site. The central site may be collocated with the cellular telephone system's MTSO. The central site is further coupled to a database, which may be remotely located from the central site and made available to subscribers.

Kovach apparently discloses a centralized database system is used in a wireless location system that determines the geographical locations of mobile wireless transmitters, the wireless location system including signal collection systems, location processors for processing digitized RF data provided by the signal collection systems, and a centralized database system for managing resources in the wireless location system. The centralized database system includes a computer, a database, and a plurality of software processes for managing the wireless location system, providing interfaces to external users and applications, and storing location records and configuration information.

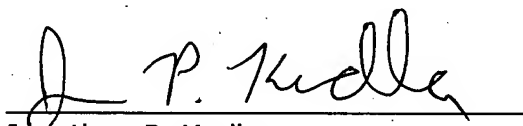
Similar to the previous section, claims 3, 5, 8 and 15 depend from independent claim 1 which Applicant respectfully submits is in condition for allowance. Therefore, Applicant further respectfully submits that claims 3, 5, 8 and 15 are allowable. Claims 13 and 37 were canceled without prejudice and the rejections of those claims are now moot. Regarding claims 18, 20, 37 and 39, these claims depend, directly or indirectly, from independent claims 16 and 35. As Applicant has inserted allowable subject matter into claims 16 and 35, Applicant also respectfully submits that these claims are now allowable. Withdrawal of the rejections of the claims is respectfully requested.

### **CONCLUSION**

Applicant believes that all pending claims are allowable and a Notice of Allowance is respectfully requested. The amendment was made to expedite the prosecution of this application. Applicant respectfully traverses the rejections of the original and amended claims and reserves the right to re-introduce them and claims of an equivalent scope in a continuation application.

If the Examiner believes that a conference would be of value in expediting the prosecution of this application, he is cordially invited to telephone the undersigned counsel at the number set out below.

Respectfully submitted,  
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